

Monitoring: Integrity and Technical Assistance

Monitoring is a responsibility of Federal, State and local Summer Food Service Program (SFSP) administrators. The purpose of monitoring is to ensure that Program integrity is maintained, and that the Program is being run effectively. We cannot separate Program integrity from Program quality. We cannot claim to run a good SFSP without adequately documenting that meals were actually received by children and government funds were properly spent. The SFSP is watched closely by Congress and Federal Program administrators. To maintain and increase SFSP's benefits to low-income children who might otherwise go hungry when school is not in session, we must run programs that are "beyond reproach."

A SFSP site may be reviewed by Federal, State or sponsor monitors during the summer. Most sites will receive a visit from sponsor monitors the first week of operation, to ensure that major operational problems are corrected early, and another visit during the first four weeks of operation. Additional monitoring visits may be conducted by the sponsor later.

States are required by SFSP regulations to make preapproval visits to most new and larger sites in order to verify information contained in the sponsor and site application forms and to assess the sites' potential for successful Program operations. In addition, the State will conduct formal reviews of many sites' operations during the course of the summer. Monitors are in a unique position to help both the site and sponsor staff improve their operations, since they have a number of important tools at their disposal:

- Familiarity with how the Program is operated at different types of sites;
- The ability to suggest ways to improve Program operations, and to make site personnel aware of other resources and contacts; and
- The authority to deny meal reimbursement, due to flagrant or repeated violations of SFSP rules.

Monitoring and Technical Assistance: Two Linked Activities

Neither monitoring without technical assistance nor providing technical assistance without determining the need for assistance is very helpful. For either to be effective, both monitoring and technical assistance need to be provided as a combined activity.

Basic Monitoring Tips

- Know what you are going to be looking at before your review. Look at the past two reviews to see what problems were found; what improvements were recommended; who is responsible for particular activities; meal service times; and if meals are prepared on site or are delivered.
- Observing, analyzing records and asking questions are the basic activities of monitoring. A monitor should observe activities and review source documents before asking a lot of detailed questions. This is less disruptive to the site or sponsor and provides the monitor with a better basis for asking more focused questions.

• Provide an opportunity for the organization being reviewed to ask questions and raise concerns. The monitor will learn more about the organization's operations and its needs, which will later allow you to offer better technical assistance. Misunderstandings about the Program can be raised and resolved by listening to concerns.

Basic Technical Assistance Tips

• Provide on-site guidance and materials as part of the review. Corrective actions, or putting a new procedure in place, or providing advice on a specific problem during the visit, are more likely to result in a real improvement than if the sponsor only sees the writ-

- Have a good exit conference. All reviews should end with those conducting the review and those being reviewed discussing the review's findings. To ensure a useful exit conference:
 - Write a review report that describes your observations about the site problems, and offers specific corrective steps for the organization to take. Anyone who reads the report should be able to understand it; and
 - Explain all findings before you leave and make sure they are understood. The written report should stand on its own. Combining it with a good exit discussion increases the review's effectiveness.

Meal Count Integrity

Poor management, such as not accurately recording daily meal counts, can lower public and political confidence in SFSP and seriously undermine support for the Program.

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Some Common Meal Count Problem Indicators

- Recording the same number of meals served day after day;
- Recording first meals served in multiples of five (e.g. 20, 35 but rarely 21, 28);

- Never or rarely recording second meals served or excess meals except on the day of a review; or
- Serving a substantially lower number of meals on the day of a review than on previous days.

Actions to Improve Meal Count Integrity

Require the Use of Meal Count Forms With

- A daily meal count hash mark form on which site staff mark down each meal as it is served.
- An on-site meal count history to compare to the meal count on the day of the review.
- A sponsor spreadsheet which arranges meal counts by site to detect odd meal count patterns. Each page should show at least one week's meal counts for a particular site.

Site Supervisor training Should Include

• Item by item instructions/discussion on the use of the site meal count form.

 Direct discussion about the seriousness of the issue and how failure to take accurate daily counts can result in site closure.

Analysis

Continuous analysis of site data by State and sponsor staff is essential to identify and react to developing problems. A weekly meal count pattern analysis can identify sites with odd patterns.

Graduated Response System

This system uses progressively stronger steps to deal with unusual meal count patterns: discussion of the problem, meal order cuts, retraining of site staff, temporary closure of a site, replacement of site staff, and finally, permanently closing a site if necessary.

